

Applicant: Wang *et al.*
Application No.: 10/849,753

REMARKS/ARGUMENTS

Claims 1-10 are currently pending.

The Office Action rejected claims 1-10 under 35 U.S.C. 103(a) as being unpatentable over applicant's admitted prior art in view of Kim (US 2001/0015716). Applicant respectfully submits that claims 1-10 are unobvious for the following reasons.

According to MPEP 8th ed. 706.02(j), to establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Applicant states that there is no motivation to combine the prior art and Kim. The object of the present invention is to provide a device and a method for driving the polarity inversion of electrodes in a dot/pixel inversion manner with reduced polarity switching frequency (See application paragraph [0007]), which is advantageous because of its reduced power consumption and simplified design.

The objective of Kim, by contrast, is to prevent differences in brightness between adjacent pixels, caused by coupling capacitance between pixel electrodes and adjacent data lines formed in a misaligned process (See Kim paragraphs [0017] and [0032]). Thus, the goal of Kim is different from the present invention, and Kim paragraph [0017] even teaches away from the presently claimed invention, which

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makes Kim inapplicable as prior art. *In re Bell*, 991 F.2d 781 (Fed. Cir. 1993) (references that do not "fairly suggest" combination cannot be properly combined). Since the prior art does not refer to or concern about the problem resulting from misalignment process, there should be no suggestion or motivation to one of ordinary skill in the art to combine the prior art and Kim's pixel groups. Accordingly, the present invention is not obvious over the prior art in view of Kim.

Further, according to MPEP 8th ed. 706.02(j), to establish a prima facie case of obviousness, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Neither Applicant's admitted prior art nor Kim teach or suggest "polarity inverting signal... having a frequency... lower than a display frequency of sub-pixel" any polarity inverting signal having a frequency lower than a display frequency of sub-pixels as recited in independent claims 1 and 6 of the present application. The Action points to no reference that teaches or suggests this claimed element, and thus, reconsideration of the claims is respectfully requested.

Conclusion

If the Examiner believes that any additional minor formal matters need to be addressed in order to place this application in condition for allowance, or that a telephone interview will help to materially advance the prosecution of this

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application, the Examiner is invited to contact the undersigned by telephone at the Examiner's convenience.

In view of the foregoing remarks, Applicants respectfully submit that the present application, including claims 1-10, is in condition for allowance and a notice to that effect is respectfully requested.

Respectfully submitted,

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